

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HINDS COUNTY, MISSISSIPPI,

Plaintiff,

- against -

WACHOVIA BANK N.A., et al.,

Defendants.

Index No.: 08-Civ 2516

**NOTICE OF MOTION TO ADMIT J
DAVID JACKSON PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Brooke E. Pietrzak, a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission pro hac vice of:

J David Jackson
Dorsey & Whitney LLP
50 South Sixth Street, Suite 1500
Minneapolis, Minnesota 55402
(612) 340-2600

J DAVID JACKSON is a member in good standing of the Bar of the State of Minnesota.

There is no pending disciplinary proceeding against J DAVID JACKSON in any State or Federal court.

Dated: July 3, 2008
New York, New York

Respectfully submitted,

DORSEY & WHITNEY LLP

By Brooke E. Pietrzak
Brooke E. Pietrzak (BP-7314)

250 Park Avenue
New York, NY 10177
Telephone: 212-415-9200

9/1 925-656279
JUL 09 2008

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HINDS COUNTY, MISSISSIPPI,

Plaintiff,

- against -

WACHOVIA BANK N.A., et al.,

Defendants.

Index No.: 08 Civ 2516

**DECLARATION OF BROOKE E.
PIETRZAK IN SUPPORT OF
MOTION TO ADMIT J DAVID
JACKSON PRO HAC VICE**

BROOKE E. PIETRZAK, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the law firm of Dorsey & Whitney LLP, counsel for defendant Piper Jaffray & Co. ("Piper Jaffray") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement in support of Piper Jaffray's motion to admit J David Jackson as counsel pro hac vice in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in June of 1998. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Jackson is a partner at Dorsey & Whitney LLP and works in the firm's Minneapolis office. Mr. Jackson has practiced law for thirty-three (33) years and is admitted to practice before the courts of Minnesota. A Certificate of Good Standing for Mr. Jackson is attached hereto as Exhibit A.


4. I have found Mr. Jackson to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. Mr. Jackson is also fully familiar with the factual and legal issues presented in this action.

5. Accordingly, I am pleased to move the admission of J David Jackson pro hac vice.

6. I respectfully submit a proposed order granting the admission of J David Jackson, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit J David Jackson, pro hac vice, to represent Piper Jaffray in the above-captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 3, 2008 at New York, New York.



Brooke E. Pietrzak (BP-7314)

STATE OF MINNESOTA IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

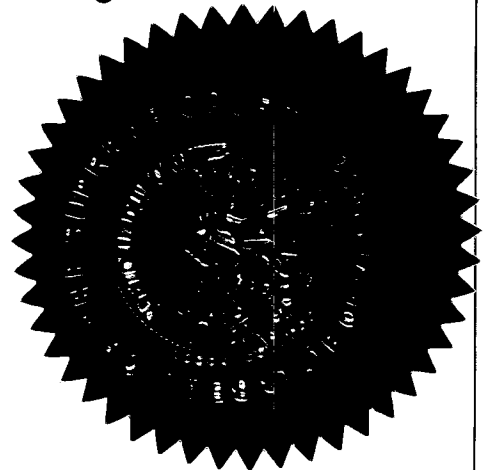
J DAVID JACKSON

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

September 16, 1974

Given under my hand and seal of this court on

July 02, 2008



Fredrick K. Grittnr

Fredrick K. Grittner
Clerk of Appellate Courts

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HINDS COUNTY, MISSISSIPPI,

Plaintiff,

- against -

WACHOVIA BANK N.A., et al.,

Defendants.

Index No.: 08 Civ 2516

**ORDER FOR ADMISSION OF J
DAVID JACKSON PRO HAC VICE**

Upon the Notice of Motion to Admit J David Jackson Pro Hac Vice and the Declaration of Brooke E. Pietrzak in Support of Motion to Admit J David Jackson Pro Hac Vice, and the exhibits thereto;

IT IS HEREBY ORDERED that J DAVID JACKSON is admitted to practice pro hac vice as counsel for defendant Piper Jaffray & Co. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at www.nysd.uscourts.gov.

Dated: July __, 2007

U.S.D.C. Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
HINDS COUNTY, MISSISSIPPI,

Plaintiff,

Index No. 08-CIV 2516

- against -

WACHOVIA BANK N.A., et al.,

Defendants.
-----X

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ERIC KUTTNER, being duly sworn, says:

I am not a party to this action, am over 18 years of age, and am employed by Dorsey & Whitney LLP at 250 Park Avenue, New York, New York 10177.

On July 9, 2008, I served a true copy of Notice of Motion to Admit J David Jackson Pro Hac Vice, and Declaration of Brooke E. Pietrzak in Support of Motion to Admit J David Jackson Pro Hac Vice, and Exhibits thereto, by mailing the same, in a sealed envelope, with postage prepaid thereon, in a post office or official depository of the U.S. Postal Service within the State of New York, addressed to:

David Bruce Tulchin, Esq.
Sullivan and Cromwell, LLP
125 Broad Street
New York, NY 10004

Attorneys for Defendant Wachovia Bank, N. A.

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Attorneys for Defendant AIG Financial Products Corp.

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Pomerantz Haudek Block
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Attorneys for Plaintiff City of Baltimore

Roland Gustaf Riopelle, Esq.
Sercarz & Riopelle, L.L.P.
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New York, NY 10019

Attorneys for Plaintiff Hinds County

FINANCIAL SECURITY ASSURANCE
HOLDINGS, LTD
31 WEST 52ND STREET
NEW YORK, NY 10019

Defendant, No counsel of record

FINANCIAL GUARANTY
INSURANCE COMPANY
125 PARK AVENUE
NEW YORK, NY 10017

Defendant, No counsel of record

NATIXIS S.A.
45 RUE SAINT-DOMINIQUE
75007 PARIS
FRANCE

Defendant, No counsel of record

MORGAN STANLEY
1585 BROADWAY
NEW YORK, NY 10036

Defendant, No counsel of record

UBS AG
BAHNHOFSTRASSE 45
CH-8098
ZURICH, SWITZERLAND

Defendant, No counsel of record

XL ASSET FUNDING LLC
20 N. MARTINGALE ROAD, SUITE 200
SCHAUMBERG, IL 60173-2415

Defendant, No counsel of record

XL LIFE INSURANCE
& ANNUITY COMPANY
20 N MARTINGALE RD, SUITE 200
SCHAUMBURG IL 60173-2415

Defendant, No counsel of record

NATIXIS FUNDING CORP.
9 WEST 57TH STREET, 36TH FLOOR
NEW YORK, NY 10019

Defendant, No counsel of record

INVESTMENT MANAGEMENT
ADVISORY GROUP, INC.
886 VAUGHN ROAD
POTTSTOWN, PA 19464

Defendant, No counsel of record

CDR FINANCIAL PRODUCTS
9777 WILSHIRE BOULEVARD, SUITE 800
BEVERLY HILLS, CA 90212

Defendant, No counsel of record

FELD WINTERS FINANCIAL, LLC
15260 VENTURA BOULEVARD, SUITE 2220
SHERMAN OAKS, CA 91403

Defendant, No counsel of record

GEORGE K. BAUM & CO.
4801 MAIN STREET, SUITE 500
KANSAS CITY, MO 64112

Defendant, No counsel of record

KINSELL NEWCOMB
& DE DIOS, INC.
2776 GATEWAY ROAD
CARLSBAD, CA 92009

Defendant, No counsel of record

SHOCKLEY FINANCIAL CORP.
2229 S. JOLIET WAY
AURORA, CO 80014

Defendant, No counsel of record

SOUND CAPITAL MANAGEMENT, INC.
6400 FLYING CLOUD DRIVE, SUITE 210
EDEN PRARIE, MN 55344

Defendant, No counsel of record

MORGAN KEEGAN & CO., INC.
50 N. FRONT STREET
MEMPHIS, TN 38103

Defendant, No counsel of record

MGIC INVESTMENT CORP.
250 E. KILBOURN AVE
MILWAUKEE, WI 53202

Defendant, No counsel of record

SECURITY CAPITAL ASSURANCE LTD.
A.S. COOPER BUILDING
26 REID STREET, 4TH FLOOR
HAMILTON HM 11
BERMUDA

Defendant, No counsel of record



ERIC KUTTNER

Sworn to before me this
17th day of July, 2008



NOTARY PUBLIC

JOYCE MARY JOYCE
Notary Public, State of New York
No. 01J04737450
Qualified in Queens County
Commission expires 08/31/2009

STATE OF NEW YORK, COUNTY OF

ss:

I, the undersigned, am an attorney admitted to practice in the courts of New York State, and

Check Applicable Box ☐ Attorney's Certification certify that the annexed has been compared by me with the original and found to be a true and complete copy thereof.

☐ Attorney's Verification of Affirmation say that: I am the attorney of record, or of counsel with the attorney(s) of record, for I have read the annexed know the contents thereof and the same are true to my knowledge, except those matters therein which are stated to be alleged on information and belief, and as to those matters I believe them to be true. My belief, as to those matters therein not stated upon knowledge, is based upon the following:

The reason I make this affirmation instead of is .

I affirm that the foregoing statements are true under penalties of perjury.
Dated: , 20

(Print signer's name below signature)

STATE OF NEW YORK, COUNTY OF

ss:

being sworn says: I am

Check Applicable Box ☐ Individual Verification in the action herein; I have read the annexed know the contents thereof and the same are true to my knowledge, except those matters therein which are stated to be alleged on information and belief, and as to those matters I believe them to be true. the of

☐ Corporate Verification a corporation, one of the parties to the action; I have read the annexed know the contents thereof and the same are true to my knowledge, except those matters therein which are stated to be alleged on information and belief, and as to those matters I believe them to be true.

My belief, as to those matters therein not stated upon knowledge, is based upon the following:

Sworn to before me on , 20

(Print signer's name below signature)

STATE OF NEW YORK, COUNTY OF

ss:

being sworn says: I am not a party to the action, am over 18 years of age and reside

at
On, 20 , I served a true copy of the annexed

in the following manner:

Check Applicable Box ☐ Service By Mail by mailing the same in a sealed envelope, with postage prepaid thereon, in a post-office or official depository of the U.S. Postal Service within the State of New York, addressed to the last known address of the addressee(s) as indicated below:

☐ Personal Service by delivering the same personally to the persons and at the addresses indicated below:

Sworn to before me on , 20 .

(Print signer's name below signature)